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13 UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 IN RE: BABY FOOD PRODUCTS LIABILITY  
16 LITIGATION

Case No. 24-MD-3101-JSC

MDL 3101

17 This Document Relates To:

18 ALL ACTIONS

**DECLARATION OF PETER RYAN IN  
SUPPORT OF MOTION TO DISMISS**

Hearing Date: February 27, 2025  
Time: 9:00 a.m.  
Location: Courtroom 8

[Filed and Served Concurrently with Motion  
to Dismiss; Request for Judicial Notice]

Complaint Filed: July 15, 2024  
Trial Date: None Set

**DECLARATION OF PETER RYAN**

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3       1.       I am an attorney duly licensed to practice in the State of Pennsylvania and have been  
4 admitted *pro hac vice* to the United States District Court, Northern District of California. I am a  
5 Member of Cozen O'Connor, attorneys herein for Defendant, CAMPBELL SOUP COMPANY  
6 ("Defendant"). I have personal knowledge of the matters stated below and if called as a witness, I  
7 could and would testify competently thereto.

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9       2.       Attached as **Exhibit A** to this declaration in support of the Request for Judicial Notice  
10 ("RJN") filed concurrently herewith is a true and correct copy of Campbell Soup Company's 10-Q  
11 dated May 2, 2021. The filing is publicly available through the SEC's Electronic Data Gathering,  
12 Analysis, and Retrieval (EDGAR) system.

13       3.       Attached hereto as **Exhibit B** is a true and correct copy of Plum, PBC's Certificate of  
14 Good Standing from Delaware's Secretary of State, retrieved on October 17, 2024.

15       4.       Attached hereto as **Exhibit C** is a true and correct copy of Campbell Soup Company's  
16 10-K dated July 28, 2013. The filing is publicly available through the SEC's EDGAR system.

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18       5.       Attached hereto as **Exhibit D** is a true and correct copy of Campbell Soup Company's  
19 8-K dated June 9, 2021. The filing is publicly available through the SEC's EDGAR system.

20       6.       Attached hereto as **Exhibit E** is a true and correct copy of Campbell Soup Company's  
21 attachment to the 8-K dated June 9, 2021. The filing is publicly available through the SEC's EDGAR  
22 system.

23       7.       Attached hereto as **Exhibit F** is a true and correct copy of the Nest Collective, Inc.'s  
24 Statement and Designation by Foreign Corporation dated January 12, 2009.

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26       8.       Attached hereto as **Exhibit G** is a true and correct copy of Plum, Inc.'s Amended  
27 Statement by Foreign Corporation dated November 5, 2012.

9. Attached hereto as **Exhibit H** is a true and correct copy of Plum, Inc.'s Name Change to Plum PBC dated August 1, 2013.

10. Attached hereto as **Exhibit I** is a true and correct copy of Plum PBC's Name Change to Plum, PBC dated October 2, 2013.

11. Attached hereto as **Exhibit J** is a true and correct copy of the Registration of Plum Stylized Trademark dated January 5, 2016.

12. Attached hereto as **Exhibit K** is a true and correct copy of the USPTO Notice of Acceptance and Renewal dated October 3, 2016.

13. Attached hereto as **Exhibit L** is a true and correct copy of the Registration of Plum Trademark dated March 7, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 2, 2024 at Philadelphia, Pennsylvania.

/s/ Peter M. Ryan  
Peter M. Ryan  
Declarant